

Fill in this information to identify the case:

Debtor 1

Kevin E O'Shea, Jr

Debtor 2

(Spouse, if filing)

United States Bankruptcy Court for the: Middle District of

Pennsylvania

(State)

Case number 5:19-bk-05359-MJC

Form 4100R

**Response to Notice of Final Cure Payment**

**10/15**

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

**Part 1: Mortgage Information**

Name of Creditor: U.S. Bank National Association, not in its individual capacity but solely in its capacity as Indenture Trustee of CIM Trust 2021-NR4

Court claim no. (if known):

1-1

Last 4 digits of any number you use to identify the debtor's account: XXXXXX7310

Property address:

209 Skyline Dr

Number Street

Archbald, PA 18403-1969

City State ZIP Code

**Part 2: Pre-petition Default Payments**

Check one:

- ☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the pre-petition default on the creditor's claim
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the pre-petition default on the creditor's claim. Creditor asserts that the total pre-petition amount remaining unpaid as of the date of this response is: \$ \_\_\_\_\_

**Part 3: Post-petition Mortgage Payment**

Check one:

- Creditor states that the debtor(s) are current with all post-petition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next post-petition payment from the debtor(s) is due on: 03/01/2025  
MM/DD/YYYY

**Post-petition payment amount is \$1,796.33.**

- ☐ Creditor states that the debtor(s) **are not current** on all post-petition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- |   |         |      |
|---|---------|------|
| a. Total post-petition payments due:                            | (a) \$  | 0.00 |
| b. Total fees, charges, expenses, escrow, and costs outstanding | +(b) \$ | 0.00 |
| c. <b>Total.</b> Add lines a and b                              | (c) \$  | 0.00 |

Creditor asserts that the debtor(s) are contractually Obligated for the post-petition payment(s) that first became Due on:

\_\_\_\_\_  
MM/DD/YYYY

**Part 4: Itemized Payment History**

If the creditor disagrees in Part 2 that the pre-petition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all post-petition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

**Part 5: Sign Here**

**The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.**

Check the appropriate box:

- ☐ I am the creditor  
☒ I am the creditor's authorized agent

**I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.**

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

/s/Maria Tsagaris

Signature

Date 02/14/2025

Print

Maria Tsagaris

First Name

Middle Name

Last Name

Title Authorized Agent for the Creditor

Company

McCalla Raymer Leibert Pierce, LLP

**If different from the notice address listed on the proof of claim to which this response applies:**

Address

325 Chestnut Street, Suite 725

Number

Street

Philadelphia, PA 19106

City

State

Zip Code

Contact phone 678-281-6532Email Maria.Tsagaris@mccalla.com

In Re: Kevin E O'Shea, Jr

Bankruptcy Case No.: 5:19-bk-05359-MJC  
Chapter: 13  
Honorable Judge: Mark J Conway

### CERTIFICATE OF SERVICE

I, Maria Tsagaris, of McCalla Raymer Leibert Pierce, LLP, 325 Chestnut Street, Suite 725, Philadelphia, PA 19106, certify:

That I am, and at all times hereinafter mentioned, was more than 18 years of age;

That on the date below, I caused to be served a copy of the within Response to Notice of Final Cure Payment filed in this bankruptcy matter on the following parties at the addresses shown, by regular United States Mail, with proper postage affixed, unless another manner of service is expressly indicated:

Kevin E O'Shea, Jr  
209 Skyline Dr  
Archbald, PA 18403

Eugene J. Doud, Esq.  
Law Offices of Doud and Coyne  
1418 Main Street, Suite 102  
Peckville, PA 18452

*(served via ECF Notification)*

Jack N Zaharopoulos, Trustee  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036

*(served via ECF Notification)*

United States Trustee  
US Courthouse  
1501 N. 6th St  
Harrisburg, PA 17102

*(served via ECF Notification)*

I CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed on: 02/14/2025 By: /s/Maria Tsagaris  
(date) Maria Tsagaris,  
Authorized Agent for the Creditor